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Attorneys for Defendant(s):
RWS ENTERPRISES WHICH WILL DO BUSINESS
IN CALIFORNIA AS KIDDIE KANDIDS, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JACQUELYN HARRIS, LORA MOTE, and
COURTNEY COLIANNA, on behalf of
themselves and all others similarly situated,

Case No. C 08-00852 PJH

Plaintiffs,

VS

RWS ENTERPRISES WHICH WILL DO BUSINESS IN CALIFORNIA AS KIDDIE KANDIDS, INC, and DOES 1 through 50, inclusive,

**STIPULATION OF THE PARTIES AND
[PROPOSED] ORDER RE:
CONTINUANCE OF PLAINTIFFS'
MOTION TO REMAND, AND CASE
MANAGEMENT CONFERENCE DUE
TO SETTLEMENT**

Defendants.

Complaint Filed: January 4, 2008

Stipulation Of The Parties And [Proposed] Order Re: Continuance Of Plaintiffs' Motion For Remand, And Case Management Conference
– Page 1

1 The parties have engaged in settlement discussions and have agreed in principle to the terms of
2 a settlement. They stipulate and agree to continue Plaintiffs' Motion to Remand this Action to State
3 Court and initial Case Management Conference for approximately 30 days in order to reduce their
4 agreement to writing and to file an application for this Court's approval of the settlement. Thus,
5 pursuant to Northern District Local Rules, rule 6.2 and 7.12, the parties, by their attorneys of record,
6 stipulate as follows:

- 7 (1) Plaintiffs' Motion to Remand presently set for May 21, 2008 be continued to June 25,
8 2008, at 9:00 a.m., and that the deadlines for filing Defendant's opposition and Plaintiffs'
9 reply papers be calculated, in accordance with Federal Rules of Civil Procedure, from the
10 June 18th hearing date; and,
- 11 (2) The initial Case Management Conference be continued from June 5, 2008, to July 10,
12 2008, at 2:30 p.m. The parties will comply with Federal Rules of Civil Procedure, rule 26
13 subdivision (f).

14 The parties have stipulated and obtained this Court's prior consent to two continuances of
15 Plaintiff's Motion and one continuance of the initial Case Management Conference.

16 IT IS SO STIPULATED:

17 DATED: April 17, 2008

18 DESOUZA LAW OFFICES
a professional corporation

19 _____
20 /s/
21 By: Jacqueline deSouza
22 Jacqueline deSouza
23 Attorneys for Defendant
24 RWS ENTERPRISES WHICH WILL DO
25 BUSINESS IN CALIFORNIA AS KIDDIE
26 KANDIDS, INC.
27
28

1 DATED: April 21, 2008

LAW OFFICES OF RANDALL CRANE

2 _____
3 By: Randall Crane
4 Randall Crane
5 Attorneys for Plaintiffs
6 JACQUELYN HARRIS, LORA MOTE, and
7 COURTNEY COLIANNA, on behalf of
8 themselves and all others similarly situated.

9
10 Pursuant to the Parties' stipulation and Good Cause Appearing, this Court GRANTS the
11 Parties' request for a continuance of Plaintiffs' Motion to Remand. The Plaintiffs' Motion shall be
12 heard on June 25, 2008, at 9:00 am in Department 17 of this Court. Defendant's opposition and
13 Plaintiffs' reply shall be calendared from the June 21, 2008 hearing date in accordance with the
14 Federal Rules of Civil Procedure. The initial Case Management Conference is continued to July 10,
15 2008, at 2:30 p.m., in Department 17.

16 IT IS SO ORDERED:

17
18 DATED: April __, 2008

19 By: _____
20 The Hon. Phyllis J. Hamilton
21 Judge of the United States District Court
22 Northern District of California